

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

BRAD AMOS,

Plaintiff,

vs.

**THE LAMPO GROUP, LLC and DAVE
RAMSEY,**

Defendant.

|
|
|
|
|
|
|
|
|
|
|

Case No: 3:21-cv-00923

Judge Richardson/Holmes

Jury Demand

**PLAINTIFF’S UNOPPOSED MOTION TO CONTINUE TRIAL DATE AND FOR
EXTENSION OF TIME TO COMPLETE DISCOVERY AND EXTENSION OF TIME
TO FILE DISPOSITIVE MOTIONS**

Comes now the Plaintiff, Brad Amos, in this matter and moves this honorable Court to continue the trial in this matter currently set for October 3, 2023. In support Plaintiff would show as follows:

The Parties have not previously requested a continuance of the trial in this matter. The Parties have been very diligent litigating this matter, however the Parties have discovery remaining they have not been able to complete.

Further, pending motions exist which will affect the discovery deadline, dispositive motion deadline, and trial date including Defendants’ Motions to Dismiss (Docs. 28, 30), Defendant Ramsey’s Appeal from the Magistrate Order Regarding the Deposition of Mr. Ramsey (Doc. 72), and Plaintiff’s Motion for Sanctions. (Doc. 83).

In addition, in March Plaintiff’s attorney suffered from both a COVID infection for a week and then developed an infection of the ears, throat, and lungs which caused him to be on

bed rest for an additional week. Given counsel's sickness and the Parties' discovery disputes, the Parties have been unable to conclude discovery in a timely manner.

Further, other discovery disputes may still exist. Additional time will provide time for the Parties to work together to resolve these issues without the involvement of the Court.

As such, Plaintiff requests the discovery deadline, dispositive motion deadline, and the trial in this matter be continued as follows:

1. **The parties shall complete discovery by July 15, 2023**
2. **Dispositive Motions shall be filed by July 22, 2023, Responses will be due 28 days later, and any Replies will be due 14 days thereafter.**
3. **A Trial Date shall be set not earlier than January 15, 2024**

Pursuant to Local Rule 7.01(a)(1), Plaintiff certifies that he has conferred with Defendants, through counsel, and they do not oppose this motion.

Respectfully Submitted,

/s/ Jonathan A. Street_____

Jonathan A. Street
Lauren Irwin
1720 West End Ave, Suite 402
Nashville, TN 37203
street@eclaw.com
lauren@eclaw.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that, on April 7, 2023, I caused the foregoing to be filed via the Court's electronic filing system, which will automatically notify and send a copy of the filing to:

Leslie Goff Sanders (TN #18973)

Daniel Crowell (TN #31485)

Stephen Stovall (TN #37002)

BARTON LLP

611 Commerce Street, Suite 2603

Nashville, TN 37203

lsanders@bartonesq.com

dcrowell@bartonesq.com

sstovall@bartonesq.com

Attorneys for Defendants

/s/ Jonathan A. Street